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ATTORNEYS-AT-LAW

July 14, 2025

Via ECF

U.S. Magistrate Judge Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York

Re: Berkley Insurance Company v. FG-PH Corp., et al.
Case No.: 22-cv-02109-DG-TAM
Letter Application for Extension of Time to Respond

Dear Judge Merkl:

Our office serves as counsel to defendants and judgment debtors FG-PH Corp., Arista Mechanical HVAC, Inc., CEGF&G Plumbing Corp., 1815 Linden LLC, Efstratios Georgelis, Michael Panagiotopoulos, Polyxeni Panagiotopoulos, Carlos Cassius, and Carmen Cassius ("Defendants") in the above action.

In response to plaintiff Berkley Insurance Company's ("Plaintiffs") three motions seeking charging orders pursuant to FRCP 69, this Court directed Defendants' responses be filed by July 14, 2025. However, due to defense counsel's scheduled vacation time and calendar for the past week, additional time is needed. Accordingly, Defendants seek a two-week extension of time to respond to Plaintiff's first, second, and third motions for charging orders.

Thank you for Your Honor's consideration of this request, and please feel free to contact our office with any questions or concerns.

Best Regards,
THE FRANK LAW FIRM P.C.
s/Thomas J. Frank
Thomas J. Frank
For the Firm

cc: Charles E. Williams III, Esq. (via ECF)
Jean -Claude Mazzola, Esq. (via ECF)